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Attorney For Debtor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	CASE NO. 14-44789-13
	§	
Albert O. Shields, Sr.,	§	
xxx-xx-3658	§	
	§	Hearing Date: 5/6/2016
	§	Hearing Time: 10:30 am
	§	
	§	
5451 N Hwy 144	§	
Granbury, TX 76048	§	
	§	
	§	
Debtor(s)	§	

**DEBTOR'S MOTION TO MODIFY CHAPTER 13 PLAN AFTER CONFIRMATION
DATE OF MODIFICATION: *March 31, 2016***

Pursuant to 11 U.S.C. §1329 the Debtor requests the following modification(s) to the Debtor's original or last modified Chapter 13 plan.

HISTORY OF CASE

Petition Date:	120/1/2014
First Meeting Date:	01/06/2015
Confirmation Date:	04/03/2015
Total Paid in to Date:	<u>\$3906.00</u>
Amount Due to be Current:	<u>\$6624.00</u>
Plan Base (Current):	<u>\$46488.00</u>

MODIFICATION(S) OF DEBTOR'S(S) PAYMENTS TO TRUSTEE

Change monthly payment amount from \$906.00 for 44 months to \$906.00 for 8 months then \$1039.00 for 36 months

Debtor's new payment start date may not be more than 30 days from above date.

*Debtors in cases filed before 10-17-05 must pay all projected monthly disposable income into the plan for no less than 36 months (unless unsecured claims are being paid 100%

*Debtors in cases filed on and after 10-17-05 must pay their projected monthly disposable income into the plan for the benefit of unsecured creditors for no less than the Applicable Commitment Period (36 or 60 months) (unless unsecured claims are being paid 100%), and the plan term shall not exceed 60 months.

The above changes(s) will result in a new "BASE AMOUNT" (total payments due to the Trustee under the Plan, if all payments are timely made) of \$48558.00 AND

Plan payments to the Trustee as listed above will resume on or before April 30, 2016. The Chapter 13 Trustee must lower the Wage Order Instantly if modification calls for a reduction in payment.

MODIFICATION OF PAYMENTS TO CREDITOR(S)

Unsecured Creditors in cases filed before 10-17-05 are to be paid a pro rata share of debtor's projected monthly disposable income times 36, after payment of all administrative, priority, secured and any special class unsecured claims provided for payment by the Trustee under the plan.

Unsecured creditors in cases filed on or after 10-17-05 are to be paid a pro rate share of the Unsecured Creditors' Pool consisting of all debtor's projected monthly disposable income to be received in the Applicable Commitment Period.

ADD:

NAME:	COLLATERAL	CLASS:	AMOUNT:	VALUE:	%	TREATMENT
	n/a		\$			

MODIFY:

NAME:	COLLATERAL	CLASS:	AMOUNT:	VALUE:	%	TREATMENT
	n/a		\$			

The automatic stay shall be lifted and the Trustee shall cease disbursement on account of any surrender of collateral as indicated above, without further order of the court as of the date of filing hereof, pursuant to General Order 2006-01, paragraph 4e. The automatic stay shall be lifted and the Trustee shall cease disbursement on account of any surrender of collateral as indicated above, without further order of the court as of the date of filing hereof, pursuant to General Order 2006-01, paragraph 4e.

DEBTOR'S(S) ATTORNEY FEES

Total amount of \$400.00, of which ~~\$400.00~~ will be paid through the plan by the Trustee pro rata, after payment of specified monthly payments and before any other pro rata payments.

REASON(S) FOR MODIFICATION:

- xxxx To cure plan arrears to the Trustee (if any)
_____ To replace an Interlocutory Order that was previously entered (if any)
_____ To Provide or modify treatment for Secured, Priority or Unsecured claim not previously provided for.
_____ To make plan sufficient (based on allowed claims).
_____ To modify the unsecured creditors pool to reduce the amount of the creditor pool to the amount already dispersed.
_____ To modify percentage to Unsecured Creditors in a pre-10-17-05 case from _____% to _____%.
_____ Other: _____

All other provisions as set forth in the last confirmed plan remain the same.

DATED this the 31st day of March, 2016.

Respectfully submitted,

Bailey & Galyen

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ATTORNEY FOR DEBTOR

By /s/ John Brannon

John Brannon
Bar #02895500

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a copy of the foregoing was served, on or within one business day of the filing of this document, by first class mail, postage pre-paid on the most recent mailing matrix maintained by the Court as of the date this document was filed with the court, as well as the debtor(s) in this case. This document was sent via electronic transfer by the Clerk's office to:

Timothy Truman
Chapter 13 Trustee
6851 NE Loop 820, Suite 300
N. Richland Hills, TX 76180

Office of the United States Trustee
1100 Commerce Street, Room 976
Dallas, Texas 75242

By /sJohn Brannon
John Brannon